

**United States District Court
Western District of Texas
Waco Division**

Profectus Technology LLC,

Plaintiff

v.

Google LLC,

Defendant

Case No. 6:20-cv-00101-ADA

Joint Claim Construction Statement

Per the Court’s Scheduling Order, the Parties, Profectus Technology LLC and Google LLC, submit this Joint Claim Construction Statement. The sole asserted patent is U.S. Patent No. 6,975,308.

Agreed Constructions

Claim Term	Agreed Construction
“stand alone” Claims 1, 22, 29	independently satisfying each of the claimed features
“mountable” Claims 1, 6, 22, 29	having a feature for mounting
“picture frame” Claims 1, 6, 7, 8, 22, 29	a unit used to replace a conventional picture frame
“portable memory device” Claims 5, 24	external storage media

Disputed Terms

Claim Term (Party Proposing)	Profectus's Proposed Construction	Google's Proposed Construction	Court's Construction
<p>“control circuitry” (Google)</p> <p>Claims 1, 3, 22, 29</p>	<p>Plain and ordinary meaning. Not a means-plus-function term.</p>	<p>Means-plus-function term subject to § 112, ¶ 6.</p> <p>Indefinite.</p>	
<p>“interface” (Google)</p> <p>Claims 1, 4, 5, 22, 23, 24, 29</p>	<p>Plain and ordinary meaning.</p> <p>Not limited to a wired “interface”</p>	<p>“a shared electrical boundary between parts of a computer system, through which information is conveyed”</p> <p>OR</p> <p>“The circuitry that interconnects and provides compatibility between a central processor and peripherals in a computer system.”</p>	

Claim Term (Party Proposing)	Profectus's Proposed Construction	Google's Proposed Construction	Court's Construction
<p>“activating the display screen” (Both parties)</p> <p>Claims 1, 22</p>	<p>“switching the display screen from a screen saver or power down mode”</p>	<p>“turning on the display screen”</p>	
<p>“chang[es/ing] an image displayed” (Both parties)</p> <p>Claims 3, 22, 29</p>	<p>“altering or replacing an image displayed”</p>	<p>“switching the still image on the display screen to a different still image”</p>	

December 9, 2020

Respectfully submitted,

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Certificate of Service

The undersigned certifies this document was filed electronically in compliance with Local Rule CV-5. As such, it was served on all counsel of record on December 9, 2020.

/s/ Daniel C. Callaway

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